## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN

United States of America,		
Plaintiff,		Criminal No. 21-20747
V.		Honorable Terrence G. Berg
Marcos Monarrez,		
Defendant.	/	

## GOVERNMENT'S RESPONSE OPPOSING BOND MODIFICATION

The United States of America opposes defendant's efforts to modify his bond. Defendant lives in Arizona. Part of the reason he was given bond was that he had an employment letter promising Monarrez a \$50,000 a year job at an engineering company.

But according to the defense, Monarrez has only been working part-time.

Moreover, the Arizona-based company apparently no longer has work for

Monarrez in Arizona. This is not in keeping with the defense's statements at his
bond hearing.

Defendant now wants to work 5 hours away in California, where he would spend nights at various hotels. The defense also claims that Monarrez is taking college courses and sent a selection of college courses and times that seem to lack

defendant's name thereon. Even if Monarrez enrolled for classes, he made a significant argument that he was going to work full time and get paid \$50,000 annually. That is simply not happening.

Because of the inconsistencies between what he said his job would entail and what actually happened, the Government opposes bond modification that would allow Monarrez to regularly travel to California. This is particularly so due to his interstate travel in this drug conspiracy case.

WHEREFORE, the government requests this Court deny defendant's motion to modify bond.

Respectfully submitted,

DAWN N. ISON United States Attorney

s/David Portelli
David Portelli P40688
Assistant United States Attorney
211 W. Fort Street, Suite 2001
Detroit, MI 48226
dave.portelli@usdoj.gov
(313) 226-9711

Dated: June 21, 2022

## **CERTIFICATE OF SERVICE**

I hereby certify that on June 21, 2022, I electronically filed the foregoing document with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

Richard Alexander Coomer

s/David Portelli

David Portelli Assistant United States Attorney 211 W. Fort Street, Suite 2001 Detroit, Michigan 48226 Phone: (313) 226-9711

Dave.Portelli@usdoj.gov